

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

(1) LORENA SANCHEZ)	
as SPECIAL ADMINISTRATOR)	
to BO MICHAEL GUTHRIE,)	
deceased,)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-cv-306-JFH
)	
(1) MUSKOGEE COUNTY SHERIFF,)	
In his official capacity,)	
(2) KAROLINA BOULET, individually and)	
in her official capacity as Muskogee)	
County Jail Administrator;)	
(3) LACY ROSSON; individually and in her)	
official capacity as Muskogee County)	
Jail Assistant Administrator; and)	
(4) CHIEF DEPUTY MICHAEL MAHAN;)	
(5) DEPUTY BRIAN REYES;)	
(6) GARRETT BOYD;)	
(7) LISA HOPE;)	
(8) JOSEPH COLE;)	
(9) EMMY CAPPS;)	
(10) AUTUMN OWENS-SQUIRREL;)	
(11) SAMANTHA WEISNEFELS; and)	
(12) KELSEY HALL, in their official and)	
individual capacities,)	
)	
Defendants.)	

**DEFENDANTS MUSKOGEE COUNTY SHERIFF, IN HIS OFFICIAL CAPACITY,
KAROLINA BOULET, LACY ROSSON, MICHAEL MAHAN, BRIAN REYES,
GARRETT BOYD, JOSEPH COLE, AND KELSEY HALL’S INITIAL DISCLOSURES**

Defendants Muskogee County Sheriff, in his official capacity, Karolina Boulet, Lacy Rosson, Michael Mahan, Brian Reyes, Garrett Boyd, Joseph Cole, and Kelsey Hall (“County Defendants”) submit the following Initial Disclosures pursuant to Fed. R. Civ. P. 26(a).

- (i) **Individuals likely to have discoverable information which County Defendants may use to support their defenses:**

No.	Name, address and phone number	Proposed testimony
1.	Former Sheriff Rob Frasier 200 W. poplar Fort Gibson, OK 74434 (918)478-3551	Former Muskogee County Sheriff: May testify regarding the policies, procedures, training, and operation of the Muskogee County Jail.
2.	Karolina Boulet c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Muskogee County Jail Administrator: May testify regarding her training and experience in law enforcement; her interactions with and observations of Plaintiff; and any other facts and circumstances relevant to Plaintiff's allegations in this case and her knowledge of the policies, procedures, and training at the Muskogee County Jail.
3.	Joseph Cole c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Former Detention Officer for the Muskogee County Jail: May have discoverable information regarding his knowledge and observations of the Plaintiff.
4.	Garret Boyd c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Former employee of the Muskogee County Jail: May have discoverable information regarding his knowledge and observations of the Plaintiff.
5.	Lorena Sanchez c/o Mitchell Garrett 320 S. Boston Avenue, Suite 825 Tulsa, OK 74103 (918) 585-2667; <i>and</i> Christopher Camp 7122 South Sheridan Road, Suite #2-382 Tulsa, OK 74133	Personal Representative: May testify regarding her knowledge of Plaintiff.
6.	Brian Reyes c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Reserve Deputy for the Muskogee Sheriff's Office: May have discoverable information regarding his knowledge and observations of the Plaintiff.
7.	Michael Mahan c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Former Chief Deputy for the Muskogee County Sheriff's Office: May have discoverable information regarding his knowledge and observations of the Plaintiff.
8.	Lacy Rosson c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Former Detention Officer of the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.

9.	Kelsey Hall, LPN c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Former Nurse at the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.
10.	Lisa Hope c/o Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Avenue Oklahoma City, OK 73106 (405) 235-1611	Former Detention Officer for the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.
11.	Emmey Capps c/o Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Avenue Oklahoma City, OK 73106 (405) 235-1611	Former Detention Officer for the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.
12.	Bradley Fuller 101 N. David Lane, #415 Muskogee, OK 74402	Former Muskogee County Sheriff's Office Deputy Sheriff: May testify regarding his training and experience in law enforcement; his interactions with and observations of Plaintiff; and any other facts and circumstances relevant to Plaintiff's allegations in this case.
13.	Emmey Capps c/o Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Avenue Oklahoma City, OK 73106 (405) 235-1611	Former Detention Officer for the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.
14.	Autumn Owens-Squirrel c/o Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Avenue Oklahoma City, OK 73106 (405) 235-1611	Former Detention Officer for the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.
15.	Samantha Weisnefels c/o Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Avenue Oklahoma City, OK 73106 (405) 235-1611	Former Detention Officer for the Muskogee County Jail: May have discoverable information regarding her knowledge and observations of the Plaintiff.
16.	Mike Smith, APRN 1118 West Broadway Muskogee, OK 74401 (918)681-4646	Former Nurse Practitioner at Muskogee County Jail: May have discoverable information regarding his knowledge and observations of the Plaintiff.
17.	Nurse Ellen Arnold	Nurse at the Muskogee County Detention

	c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Center: May have discoverable information regarding her knowledge and observations of the Plaintiff.
18.	Dr. Barrett Thomas Bradt St. Francis Hospital 300 Edna M. Rockefeller Dr. Muskogee, OK 74401	May have discoverable information regarding his knowledge, observations, and treatment of the Plaintiff.
19.	Dr. Johnathon D. Kirkland St. Francis Hospital 300 Edna M. Rockefeller Dr. Muskogee, OK 74401	May have discoverable information regarding his knowledge, observations, and treatment of the Plaintiff.
20.	Brian Lewis 520 Court Street Muskogee, OK 74401	Emergency Medical Technician: May have discoverable information regarding his knowledge, observations, and treatment of the Plaintiff.
21.	Vanessa Braden 520 Court Street Muskogee, OK 74401	Emergency Medical Technician: May have discoverable information regarding her knowledge, observations, and treatment of the Plaintiff.
22.	Dr. Robert Wilson St. Francis Hospital 300 Edna M. Rockefeller Dr. Muskogee, OK 74401	May have discoverable information regarding his knowledge, observations, and treatment of the Plaintiff.
23.	Dr. Kyle Summers St. Francis Hospital 300 Edna M. Rockefeller Dr. Muskogee, OK 74401	May have discoverable information regarding his knowledge, observations, and treatment of the Plaintiff.
24.	Dr. Nicholas Bull St. Francis Hospital 300 Edna M. Rockefeller Dr. Muskogee, OK 74401	May have discoverable information regarding his knowledge, observations, and treatment of the Plaintiff.
25.	Derek Perez Jackie Brannon Correctional Center 900 N. West Street, McAlester, OK 74502-1999	Former inmate of the Muskogee County Jail: May have discoverable information regarding his interactions with the Plaintiff.
26.	Brett Naegele c/o Collins Zorn & Wagner, PLLC 429 N.E. 50th Street, Second Floor Oklahoma City, OK 73105 (405) 524-2070	Employee of the Muskogee County Detention Center: May have discoverable information regarding his knowledge and observations of the Plaintiff.

27.	Trent Ailey 5101 S. Cherokee St. Muskogee, OK, 74403	Former employee of the Muskogee County Detention Center: May have discoverable information regarding his knowledge and observations of the Plaintiff.
28.	Decedent's medical/mental health care providers	
29	Plaintiff's and/or Decedent's next-of-kin's medical/mental health care providers to the extent Plaintiff and/or Decedent's next-of-kin are seeking damages for physical injuries, mental injuries, grief and/or loss of companionship	
29.	Decedent's employers, to the extent Plaintiff is seeking damages for loss of future income.	
30.	All records custodians for records objected to on the basis of authenticity.	
31.	All witnesses listed by Plaintiff and/or co-defendant not objected to by County Defendants.	

(ii) **Documents, electronically stored information and tangible things which may be used to support the defense of this case are:**

No.	Description
1.	Applicable Policies, Procedures, and training records of the Muskogee County Sheriff's Office and Muskogee County Jail
2.	MCSO Incident/Offense Report for the incident at issue
3.	Oklahoma State Bureau of Investigation (OSBI) Investigative Report and associated attachments
4.	Plaintiff's booking and jail records
5.	Office of the Chief Medical Examiner Report of Investigation by Cheryl Niblo
6.	Plaintiff's criminal history records
7.	Plaintiff's prior employment history records, to the extent Plaintiff is claiming damages for loss of future income
8.	Body camera for Deputy Bradley Fuller of Plaintiff
9.	Muskogee County Jail Surveillance Video of Plaintiff
10.	Muskogee Police Department records for Plaintiff and Body camera footage of Plaintiff
8.	Decedent's medical and mental health records
9.	Plaintiff's medical and mental health records
10.	All documents listed by Plaintiff and not otherwise objected to by County Defendants
11.	All documents listed by Defendants Owen-Squirrel, Capps, Weisenfels, and/or Hope and not otherwise objected to by County Defendants

12.	All documents identified or disclosed during discovery
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(iii) **Damages:** County Defendants are not claiming any damages related to this lawsuit.

(iv) **Insurance:** A Certificate of Participation in the Association of County Commissioners of Oklahoma Self-Insured Group (ACCO-SIG) issued to the Muskogee County Board of County Commissioners which may provide coverage to County Defendants in this case is available for Plaintiff's counsel's review and inspection.

(v) **Experts:** County Defendants have not yet retained an expert witness at this time.

Respectfully submitted,

s/ W.R. Moon Jr.

Andy A. Artus, OBA No. 16169
Jamison C. Whitson, OBA No. 18490
W.R. Moon Jr., OBA No. 32079
COLLINS, ZORN & WAGNER, PLLC
429 N.E. 50th Street, Second Floor
Oklahoma City, OK 73105
Telephone: (405) 524-2070
Facsimile: (405) 524-2078
E-mail: aaa@czwlaw.com
wrn@czwlaw.com
jcw@czwlaw.com

*ATTORNEYS FOR DEFENDANTS
MUSKOGEE COUNTY SHERIFF,
KAROLINA BOULET, JOSEPH COLE,
MICHAEL MAHAN, BRIAN REYES,
GARRETT BOYD, KELSEY HALL, AND
LACY ROSSON, in their individual and
official capacities*

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

D. Mitchell Garret
320 South Boston Avenue, Suite 825
Tulsa, OK 74103
mittchell@garrettlawcenter.com

and

Christopher L. Camp
7122 South Sheridan Road, Suite #2-382
Tulsa, OK 74133
camplawfirm@gmail.com

Attorneys for Plaintiff

Carson C. Smith
John H. Kim
Robert S. Lafferrandre
Pierce Couch Hendrickson
Baysinger & Green, L.L.P.
1109 N. Francis Ave.
Oklahoma City, OK 73106-6813
csmith@piercecouch.com
jkim@piercecouch.com
rlafferrandre@piercecouch.com

***Attorneys for Defendants,
Lisa Hope, Emmey Capps,
Autumn Owens-Squirrel, and
Samantha Weisenfels***

s/ W.R. Moon Jr.

W.R. Moon Jr.